

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
The Use of N11 Codes and Other)	CC Docket. No. 92-105
Abbreviated Dialing Arrangements)	
)	DA 04-3219
)	
)	

**SBC RESPONSE TO COMMISSION’S REQUEST TO REFRESH RECORD
REGARDING RECONSIDERATION OF THE DESIGNATION BY THE COMMISSION
OF 211 AND 511 AS ABBREVIATED DIALING CODES**

SBC filed a Request for Clarification in the above referenced proceeding on March 12, 2001.¹ In its request, SBC asked that the Commission clarify the role the Commission will play in selecting the appropriate entities to utilize 511 and 211 abbreviated dialing codes. SBC still believes the Commission needs to resolve this issue. SBC also believes that the information provided by SBC in its petition, as well as the information in the other carriers petitions, is enough for the Commission to rule on this matter.

Additionally, SBC agrees with Nextel’s characterization of the issue – that the Commission’s rules, as written, inappropriately place carriers in the role of “referee” with respect to requesting entities² -- and that (1) the Commission must “clarify what organizations are entitled to request 211 deployment”³ and (2) there should be only one translation number per state.⁴ Should the Commission decline to make such determinations, SBC agrees with Sprint

¹ Attachment A to this Response.

² Petition for Reconsideration of Nextel Communications, Inc. (Nextel Petition) at 5.

³ *Id.*

⁴ *Id.* at 6.

that the Commission must clarify what authority states possess with respect to these matters.⁵ SBC would not be opposed to the Commission delegating the authority to the states to decide what specific entity is entitled to each of these codes, but the Commission must give the states more specific guidelines regarding how to assign those numbers if it chooses to delegate such authority.

Respectfully Submitted,

/s/ Jennifer Byrd

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November 12, 2004

⁵ Sprint Petition for Reconsideration at 15-16.